

APPENDIX A

RESPONSE TO NEVADA DIVISION OF ENVIRONMENTAL PROTECTION COMMENTS



APPENDIX A

RESPONSE TO NEVADA DIVISION OF ENVIRONMENTAL PROTECTION COMMENTS

GROUNDWATER MONITORING DATA SUBMITTAL – SECOND QUARTER 2007 QUARTERLY GROUNDWATER MONITORING PROGRAM NDEP FACILITIES NO. H-000536 AND H-000540; BMI COMPLEX, HENDERSON, NEVADA

Comments Dated August 6, 2007

This Response to Comments was prepared to document responses to the Nevada Division of Environmental Protection (NDEP) comments in a letter dated August 6, 2007. Each comment is reiterated here and the response to the comment provided by the Companies to NDEP. The comments will be addressed in the order of occurrence in the letter.

1. *Page 1, 1st paragraph. The Nevada Division of Environmental Protection (NDEP) has reviewed this report and notes that the Companies referenced above elected not to provide vertical cross-sections along all transects as the NDEP had requested. The NDEP concurs with the Companies' desire to include such cross-sections in the Conceptual Site Model, however, the NDEP reiterates the request to include, in the future quarterly groundwater monitoring reports, graphs showing vertical cross-sections along all transects, with depth to completion for all wells clearly marked. Figures 5-10 can be discontinued as they provide very little useful information.*

RESPONSE: Hydrogeologic cross-sections have been prepared and are included in this third quarter 2007 data submittal (Main Text, Figures 37 through 42). The cross-sections contain pertinent lithologic, water level, and water quality data for all monitor wells located along each of the six monitoring transects in the study area. These figures graphically illustrate the relationships between study area monitor well location and construction, lithology, water level conditions, and water quality conditions for the third quarter 2007.

Additionally, water level hydrographs (referred to as Figures 5 though 10 in previous data submittals) have been revised to more clearly display useful water level data for the study area and have been retained for this third quarter 2007 data submittal (Figures 5 though 12).

2. *Page 1, 2nd paragraph. The NDEP requests a revision to the Quarterly Groundwater Monitoring Program to include quarterly monitoring of well GW-EC9, and also adding it to Transect No.3, effective immediately. The NDEP notes that benzene was reported in the GW-EC9 groundwater at 80,000 micrograms per liter, which indicates the potential presence of free phase benzene in the area directly downgradient of the Former Phosphoric Acid Pond & Leach Field (June 1, 2007: Nevada Division of Environmental Protection Response to "Response to NDEP Comments April 17, 2007 Attachment A Data Transmittal Report Results of Additional Vadose Zone Characterization Former Stauffer Chemical Company Facility" dated May 21, 2007).*



RESPONSE: The third quarter 2007 monitoring event was completed prior to the issuance of the NDEP comment. Therefore, alluvial aquifer monitor well EC-9 was not sampled during the monitoring event. However, pursuant to NDEP request, this monitor well is planned on being included in future groundwater monitor activities proposed for the study area. Recommendations for future groundwater monitoring activities are included in Section 8.0 of this third quarter 2007 data submittal.